

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION  
Civil Action File No. \_\_\_\_\_

REBECCA LANDRUM,

Plaintiff,

vs.

ANTHEM BLUE CROSS/BLOCK SHIELD,

Defendant.

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**COMPLAINT**

**COMES NOW**, the Plaintiff, Rebecca Landrum (“Plaintiff”), and shows the following:

1. This action is brought pursuant to the Employee Retirement Income Security Act under 502(a)(1)(B).
2. Defendant is a domestic profit corporation licensed to do business in the State of Georgia and is subject to the jurisdiction of this Court. Defendant may be served with process by service upon its registered agent, CT Corporation System, at 289 S. Culver Street, Gwinnett County, Lawrenceville, Georgia 30046.
3. Plaintiff was insured under the Defendant’s medical plan.
4. Pursuant to the plan’s protocol, Plaintiff received preauthorization to receive medical coverage for treatment.

5. After the medical treatment was received and billed, the Defendant denied coverage.

6. On January 13, 2020, Plaintiff appealed and requested the Defendant pay for the preauthorized treatment.

7. On March 18, 2020, Defendant denied coverage and the appeal.

8. Pursuant to the plan, Plaintiff appealed this decision and requested an outside review on June 15, 2020.

9. Defendant received the appeal via certified mail.

10. Defendant has failed to review the appeal or provide an outside review of the appeal for two (2) years. As a result, the Plaintiff has exhausted her administrative remedies and files this lawsuit.

**WHEREFORE**, the Plaintiff prays she have judgment against the Defendant in the amount of Twenty Thousand Five Hundred Forty-Five (\$20,545.00) Dollars together with reasonable attorney fees and costs.

Dated this 18<sup>th</sup> day of July 2022.

/s/ Victor Hawk  
VICTOR HAWK  
Georgia Bar No. 338650

*Attorney for Plaintiff*

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